

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

KNACK SYSTEMS, LLC)
Plaintiff/Counter-defendant,)
v.)
TECH DENALI, LLC)
Defendant/Counter-plaintiff.)
Case No. 3:21-cv-07919

Via CM/ECF

Honorable Jessica S. Allen, U.S.M.J.
District of New Jersey
Martin Luther King Building and U.S. Courthouse
Courtroom 2B
50 Walnut Street
Newark, New Jersey 07102

February 21, 2023

Re: Knack Systems, LLC v. TechDenali, LLC
Dkt. No. 21-cv-79219
Joint Letter Regarding Fact Discovery Pursuant to January 11, 2023 Letter Order

Dear Judge Allen:

Counsel for plaintiff Knack Systems, LLC (“Plaintiff”) and Tech Denali, LLC (“Defendant”) write pursuant to the Court’s January 11, 2023, letter order (ECF No. 52) directing the parties to submit a joint status letter addressing the status of the parties’ completion of fact discovery.

The parties are working to resolve any remaining issues with regard to written discovery, and have deposed a representative from third-party TTI Consumer Power Tools, Inc. (“TTI”) on January 11, 2023. The parties are in the process of scheduling party depositions, and expect to be able to complete those depositions within the next 45 days.

Therefore, the Parties jointly request additional time to complete discovery and propose the following modifications to the existing discovery deadlines:

- Fact discovery deadline: extended from 3/2/2023 to 4/13/2023;
- Affirmative expert reports: extended from 3/30/2023 to 5/11/2023;
- Responsive expert reports: extended from 4/30/2023 to 6/12/2023; and
- Expert discovery deadline: extended from 5/29/2023 to 7/10/2023.

We look forward to the parties' upcoming telephonic status conference with the Court, currently scheduled for March 2, 2023. Thank you for your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Matthew I. W. Baker

Matthew I.W. Baker, Esq.
GENOVA BURNS LLC
494 Broad Street
Newark, New Jersey 07102
mbaker@genovaburns.com

RAJAN & RAJAN, LLP
Mahesh Rajan, Jr., Esq.
Eric B. Rochkind, Esq.
1419 Oak Tree Road
Iselin, New Jersey 08830
mahesh@rajanandrajan.com

Counsel for Plaintiff, Knack Systems LLC

By: Alex Prejzner

Thomas A. Christensen
Pro hac vice
Alexandra N. Prejzner
Pro hac vice
HUCK BOUMA PC
1755 South Naperville Road, Suite 200
Wheaton, Illinois 60189
630 221-1755
tchristensen@huckbouma.com
aprejzner@huckbouma.com

By : /s/ Iram P. Valentin

Iram P. Valentin
New Jersey Attorney I.D. No. 010222002
KAUFMAN DOLOWICH VOLUCK
Court Plaza North 25 Main Street, Suite 500
Hackensack, New Jersey 07601
Telephone: (201) 708-8233
Facsimile: (201) 488-6652
ivalentin@kdvlaw.com

Counsel for Defendant, Tech Denali, LLC